IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
NORTHWESTERN CORPORATION,) Case No. 03-12872 (CGC)
Debtor.	<i>)</i>))
MAGTEN ASSET MANAGEMENT CORP.,)))
Appellant,) Civil Action No. 04-1279 (JJF)
v.	
PAUL, HASTINGS, JANOFSKY & WALKER LLP,)))
Appellee.	<i>)</i>))

NOTICE OF COMPLETION OF BRIEFING

TO: THE HONORABLE JOSEPH J. FARNAN, JR.

PLEASE TAKE NOTICE that briefing has been completed with regard to the Appeal of Magten Asset Management Corporation ("Magten") of the Order, entered by the Honorable Charles G. Case, III, on July 23, 2004, denying Magten's motion to disqualify Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings") from acting as counsel to NorthWestern Corporation, the debtor-in-possession ("NorthWestern" or "Debtor"), in the above captioned bankruptcy proceeding.

PLEASE TAKE FURTHER NOTICE that the following pleadings have been filed in connection with the Appeal:

- 1. Opening Brief on Appeal of Magten Asset Management Corporation (D.I. 21, filed 6/28/05);
- 2. Appendix to Opening Brief on Appeal of Magten Asset Management Corporation Volume I (D.I. 22, filed 6/28/05);
- 3. Appendix to Opening Brief on Appeal of Magten Asset Management Corporation Volume II (D.I. 23, filed 6/28/05);
- 4. Paul, Hastings, Janofsky & Walker LLP's Brief in Opposition to Appeal from Order Denying Motion to Disqualify (D.I. 26, filed 8/05/05);
- Compendium of Unreported Opinions Cited in Paul, Hastings, Janofsky & Walker LLP's Brief in Opposition to Appeal from Order Denying Motion to Disqualify (D.I. 27, filed 8/5/05);
- 6. Appendix to Paul, Hastings, Janofsky & Walker LLP's Brief in Opposition to Appeal from Order Denying Motion to Disqualify (D.I. 28, filed 8/05/05); and
- 7. Reply Brief on Appeal of Magten Asset Management Corporation (D.I. 29, filed 8/15/05).

Dated: Wilmington, Delaware

August 18, 2005

MORRIS, NICHOLS, ARSHT & TUNNELL

Robert J. Dehney (No. 3578) Curtis S. Miller (No. 4583) 1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899-1347

(302) 658-9200

Dennis E. Glazer, Esq.
D. Scott Tucker, Esq.
Catherine Lifeso, Esq.
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, New York 10017
(212) 450-4000

Counsel to Paul, Hastings, Janofsky & Walker LLP